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**From:** Meinertzhagen, Steve <Steve.Meinertzhagen@edelman.com>  
**Sent:** Friday, May 24, 2024 3:56 PM  
**To:** Neal, Brian; Shirley, Elizabeth  
**Subject:** Patton Logistics et al v. FedEx Ground/JAMS Arbitrations

**This is an EXTERNAL email! STOP, ASSESS, and VERIFY**

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Hello Brian and Elizabeth,

I'm an in-house attorney with Daniel J. Edelman Holdings, Inc., which you recently served with a documents subpoena in connection with the captioned arbitration matters. The subpoena was served on DJEH in Delaware, which is within the Third Circuit, and it's my understanding that the arbitrations are being conducted pursuant to the Federal Arbitration Act. The Third Circuit has adopted the majority position that the FAA does not provide for pre-hearing third-party discovery. See *Hay Group, Inc. v. E.B.S. Acquisition Corp.*, 360 F.3d 404 (3<sup>rd</sup> Cir. 2004). Consequently, DJEH will not be responding to the subpoena.

Best,  
Steve

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Exhibit B